UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Gregory S. Kinoian, Esq.
dstolz@genovaburns.com
dclarke@genovaburns.com
gkinoian@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920

Tel: (973) 467-2700 Fax: (973) 467-8126

Proposed Local Counsel for the Official

Committee of Talc Claimants

BROWN RUDNICK LLP

David J. Molton, Esq. Michael S. Winograd, Esq. Susan Sieger-Grimm, Esq. Kenneth J. Aulet, Esq.

dmolton@brownrudnick.com mwinograd@brownrudnick.com ssieger-grimm@brownrudnick.com kaulet@brownrudnick.com

Seven Times Square New York, NY 10036

Tel: (212) 209-4800 Fax: (212) 209-4801

And-

Jeffrey L. Jonas, Esq.
Sunni P. Beville, Esq.
Eric R. Goodman, Esq.
jjonas@brownrudnick.com
sbeville@brownrudnick.com
egoodman@brownrudnick.com

One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201

Proposed Co-Counsel for the

Official Committee of Talc Claimants

OTTERBOURG PC

Melanie L. Cyganowski, Esq. Jennifer S. Feeney, Esq. Michael R. Maizel, Esq.

mcyganowski@otterbourg.com jfeeney@otterbourg.com

mmaizel@otterbourg.com

230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104

Proposed Co-Counsel for the Official Committee of Talc Claimants

MASSEY & GAIL LLP

Jonathan S. Massey, Esq.
Rachel S. Morse, Esq.
jmassey@masseygail.com
rmorse@masseygail.com
1000 Maina Ava SW Suita 45

1000 Maine Ave. SW, Suite 450 Washington, DC 20024

Tel: (202) 652-4511 Fax: (312) 379-0467

Proposed Co-Counsel for the Official

Committee of Talc Claimants

	Chapter 11
In re: LTL MANAGEMENT, LLC, ¹	Case No.: 23-12825 (MBK)
Debtor.	Honorable Michael B. Kaplan

NOTICE OF MOTION TO COMPEL

PLEASE TAKE NOTICE, that *the date and time specified in the Order Shortening Notice*, the undersigned, as local bankruptcy counsel for the Official Committee of Talc Claimants (the "Committee") of LTL Management LLC, ("LTL" or the "Debtor"), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of the order submitted with this motion, and for such other relief that is just and proper.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the motion filed herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, that oral argument is requested.

PLEASE TAKE FURTHER NOTICE, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

PLEASE TAKE FURTHER NOTICE, that all objections must be in writing and filed consistent with the *Order Shortening Notice* with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Respectfully submitted,

GENOVA BURNS, LLC

	/s/Donald W. Clarke	
By:		

Donald W. Clarke, Esq. Daniel M. Stolz, Esq. 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 533-0777 Facsimile: (973) 467-8126

Email: dstolz@genovaburns.com
Email: dclarke@genovaburns.com

Proposed Local Counsel to the Official Committee of Talc Claimants of LTL Management, LLC